### Sulopenem Etzadroxil/Probenecid (Oral Sulopenem) for Treatment of Uncomplicated Urinary Tract Infections

September 9, 2024

Iterum Therapeutics

Antimicrobial Drugs Advisory Committee

### Introduction

#### Michael Dunne, MD, FIDSA

Board Member, Consultant Iterum Therapeutics

Agenda	Introduction	<b>Michael Dunne, MD, FIDSA</b> Board Member, Consultant Iterum Therapeutics
	Unmet Need	<b>Marjorie Golden, MD, FIDSA</b> Site Chief, Infectious Disease St. Raphael Campus Yale New Haven Hospital
	Microbiology Pharmacology	Michael Dunne, MD, FIDSA
	Safety	<b>Steven Aronin, MD, FIDSA</b> Senior VP and Head of Clinical Development Iterum Therapeutics
	Benefit-Risk	Michael Dunne, MD, FIDSA

# History of Key Oral Antibiotics for uUTI

Antibiotic	FDA Approval Date	<b>Resistance Rate</b> Iterum uUTI Studies, % (n)
Nitrofurantoin	February 1953	<b>16.7%</b> (344)
Cephalexin	January 1971	<b>15.9%*</b> (328)
TMP-SMX	July 1973	<b>31.0%</b> (638)
Amoxicillin/clavulanate	August 1984	<b>13.2%</b> (272)
Ciprofloxacin	October 1987	<b>26.9%</b> (554)
Fosfomycin	December 1996	<b>3.0%</b> (61)

\*Based on resistance rates for Enterobacterales versus cefazolin from Iterum's 301 and 310 studies combined using urinary breakpoints; per the FDA, CLSIpublished urinary cefazolin breakpoints should be used to predict the susceptibility of oral cephalosporins including cephalexin

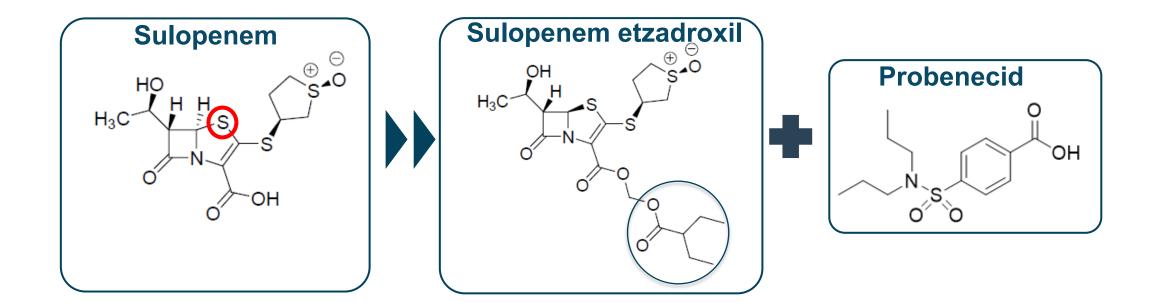
# uUTI Claims Analysis - Total uUTI Market Estimate and Distribution of Utilization

	2023 TRx in adult women (oral solids) (EVERSANA Claims)	Share of uUTI infections receiving product (EVERSANA Claims)	Implied 2023 adult women TRx in uUTI*
Nitrofurantoin	12,094,341	30%	12,094,341
Cephalexin	-	18%	7,321,051
Trimethoprim-sulfamethoxazole	-	14%	5,791,496
Ciprofloxacin	-	14%	5,812,856
Amoxicillin/Other*	-	7%	2,797,655
Amoxicillin/Clavulanate	-	8%	3,330,438
Cefdinir	-	5%	2,187,931
Levofloxacin	-	4%	1,578,098
Total	-	100%	40,913,867

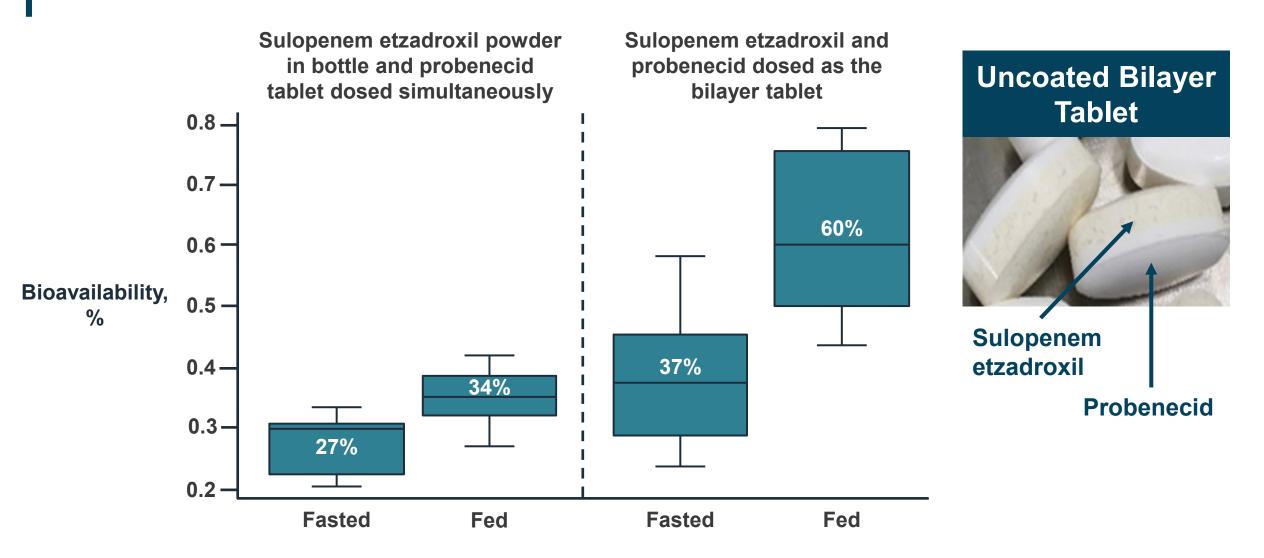
\*2023 TRx in adult women multiplied by uUTI infection shares relative to nitrofurantoin

Source: Extrapolated from EVERSANA's longitudinal pharmacy and medical claims data within ACTICS Platform (December 2022-November 2023)

# Sulopenem Etzadroxil / Probenecid (Oral Sulopenem)



# Sulopenem Etzadroxil / Probenecid (Oral Sulopenem)



# **Sulopenem Mechanism of Action**

- High affinity for penicillin binding proteins
- Broad activity against most common UTI Enterobacterales
  - E. coli, K. pneumoniae, and P. mirabilis

# Phase 3 Development Program Includes > 5,900 Patients

Study 301	Study 310	Study 302	Study 303
Uncomplicated UTI	Uncomplicated UTI	<b>Complicated UTI</b>	<b>Complicated IAI</b>
N = 1671	N = 2222	N = 1395	N = 674
Oral Sulopenem VS Ciprofloxacin	Oral Sulopenem <sub>VS</sub> Amoxicillin / Clavulanate	IV Sulopenem / Oral Sulopenem VS IV Ertapenem / Ciprofloxacin or Amoxicillin / Clavulanate	IV Sulopenem / Oral Sulopenem VS IV Ertapenem / Ciprofloxacin + Metronidazole or Amoxicillin / Clavulanate
<u>Primary Endpoint</u>	Primary Endpoint	Primary Endpoint	<u>Primary Endpoint</u>
Clinical and microbiologic	Clinical and microbiologic	Clinical and microbiologic	Clinical success
success at Day 12	success at Day 12	success at Day 21	at Day 28

# Sulopenem will Address an Unmet Medical Need for Effective Treatment of uUTI

- Existing antibiotics do not provide confidence in coverage because of increasing resistance rates
  - Approaching and exceed 20% for standard of care options which challenges use of empiric therapy
- Consistent results from Study 301 and 310 demonstrate benefit of treatment with oral sulopenem
- Oral sulopenem was found to be safe and well tolerated

### **Proposed Indication**

 ORLYNVAH tablets, a fixed-dose combination product consisting of sulopenem etzadroxil, a penem antibacterial prodrug, and probenecid, a renal tubular transport blocking agent, is indicated in adult women ≥18 years of age for the treatment of uncomplicated urinary tract infections caused by designated susceptible microorganisms.

# Important Topics for Today's Discussion



Review of Efficacy Data to Support the Proposed Indication

- Study 301
- Study 310
- Study 302 (lessons learned from cUTI study)
- 2 Review discussion topics posed by the FDA as they relate to oral sulopenem
  - Antibiotic stewardship
  - Target patient population

# **Unmet Need for uUTI Therapy**

#### Marjorie Golden, MD, FIDSA

Associate Professor of Medicine;

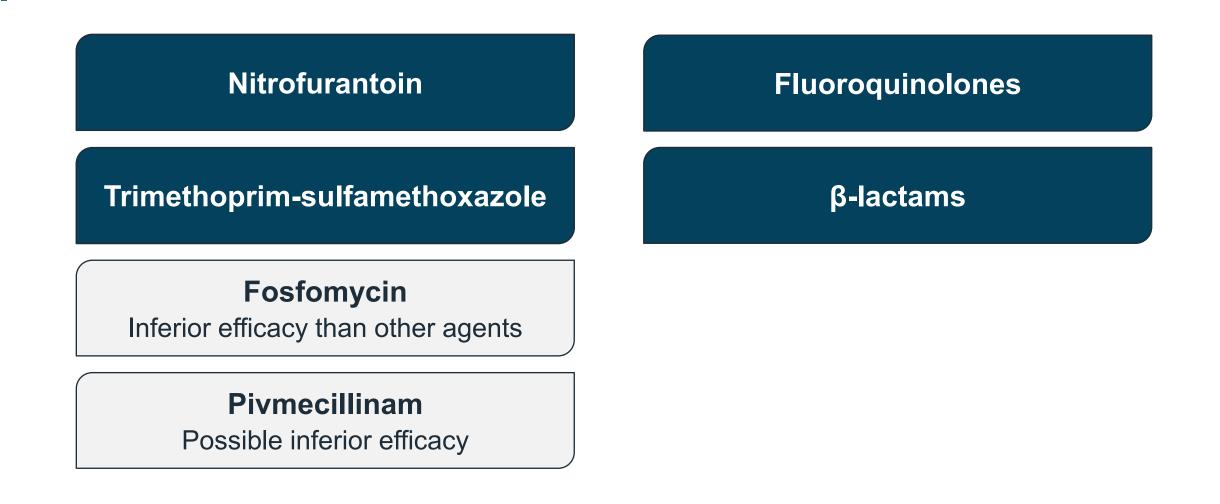
Site Chief, Infectious Disease,

St. Raphael Campus Yale New Haven Hospital

# UTIs Are Most Common Outpatient Infection in Women

- 40 million outpatient prescriptions for uUTI in the US annually
  - 60% of women will have an uUTI in their lifetime<sup>1</sup>
  - *E. coli, K. pneumoniae* and *P. mirabilis* are the most common pathogens responsible for infection
- Up to 40% of women with history of uUTI will have a recurrence of their infection<sup>2</sup>
- Rising rates of antibiotic resistance, aging population with growing comorbidities, and antibiotic allergies are making antibiotic selection more challenging

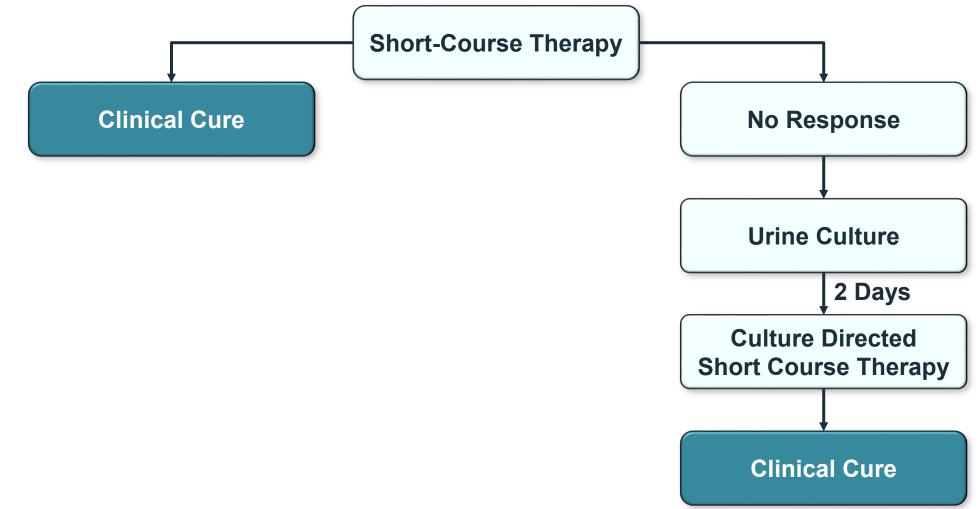
# **IDSA Guidelines for Treatment of uUTIs**



Gupta, Clin Infect Dis 2011

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# Short-Course Antibiotic Without Prior Culture is Standard of Care for Uncomplicated UTIs



Adapted from Mandell, 2019

# **Selection of Appropriate Antibiotic Therapy**

- For practicing clinicians, decision about treatment is made based on IDSA guidelines, but also requires a thoughtful assessment of the patient's overall condition
- Underlying medical conditions
  - Medication list
  - Allergy history
  - Understanding risk/benefit profile
- History of resistant pathogens

# **Representative Clinical Scenario**

- 70-year-old woman with Diabetes mellitus, interstitial lung disease (ILD) and Parkinson's disease developed lower abdominal pain, low grade fever, dysuria
- Urinalysis with 560 WBC
- Sulfa allergy (rash and acute kidney injury)
- Prefer to avoid nitrofurantoin in setting of known ILD
- Intolerable diarrhea with prior courses of Fosfomycin
- No current viable oral options

# **Representative Clinical Scenario**

	Escherichia coli		
	MIC Susceptibility	Kirby Bauer Susceptibility	
Amikacin	Susceptible		
Ampicillin	Resistant		
Ampicillin + Sulbactam	Susceptible		
Cefazolin	Resistant <sup>1</sup>		
Ceftriaxone	Resistant		
Cefuroxime	Resistant		
Ciprofloxacin	Resistant		
Ertapenem	Susceptible		
Fosfomycin		Susceptible	
Gentamicin	Resistant		
Nitrofurantoin	Susceptible		
Piperacillin + Tazobactam	Susceptible		
Tobramycin	Resistant		
Trimethoprim + Sulfamethoxazole	Susceptible		

# **Rising Rates of Resistance Increase Risk of Failure** With Empiric Therapy

	Non-Susceptible	Second Prescription at Day 28	
Antibiotic Prescribed	Pathogen N = 5395	Non-Susceptible	Susceptible
Fluoroquinolone	22.8%	35.9%	16.0%
Trimethoprim-sulfamethoxazole	27.6%	36.8%	17.8%
Nitrofurantoin	15.9%	37.0%	20.3%

#### IDSA Guidelines Imply that Prescribers Should Avoid an Antibiotic if Resistance Prevalence > 20%

	Percent Resistance Among Urine Isolates Collected		
Antibacterial Agent / Class	<b>2011-2020</b> <sup>1*</sup> N = 2,228,515	<b>IT001-301</b> <b>2018-2020</b> N = 1,071	<b>IT001-310</b> <b>2022-2023</b> N = 990
β-lactam <sup>2</sup>	57.5%	63.0%	29.7%
ESBL+	6.9%	13.5%	9.9%
Fluoroquinolone	20.6%	27.4%	26.4%
Trimethoprim-sulfamethoxazole	23.1%	31.6%	30.3%
Nitrofurantoin	20.2%	17.9%	15.4%

**1:** Dunne, *BMC Infect Dis* 2022; \*Organisms tested: 73% *E. coli*, 14% *K. pneumoniae*, 6% *P. mirabilis;* 7% Other Enterobacterales **2:** β-lactams tested: (Dunne<sup>1</sup>: ampicillin-sulbactam, 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> generation cephalosporins, piperacillin-tazobactam, carbapenems; IT001-301: amoxicillinclavulanate, ampicillin, cefazolin, ceftazidime-avibactam, ceftriaxone, ertapenem, imipenem, meropenem, piperacillin-tazobactam; IT001-310: amoxicillinclavulanate, cefazolin, ceftriaxone, ertapenem, meropenem)

# Increasing Percent of Co-Resistance Among UTI Isolates of *E. coli*

	Levofloxacin (quinolone)	Trimethoprim- sulfamethoxazole
Co-resistant Agent (Class)	N = 445	N = 588
Cefuroxime (β-lactam)	45.7%	31.3%
Ciprofloxacin (quinolone)	100%	44.2%
Trimethoprim-sulfamethoxazole	56.2%	100%

# **Asymptomatic Bacteriuria (ASB)**

#### **IDSA Recommendations**<sup>1</sup>

- Screening for and treatment of ASB not recommended for most patients
- Only screen and treat when
  - Patient is pregnant
  - Patient is undergoing an endourologic procedure

My clinical practice, supported by the literature<sup>2</sup>; do not culture if no symptoms and strongly discourage "proof of cure" cultures

1: Nicolle, 2019; Collins, 2016; Leis, 2014; Kelley 2014; Hartley, 2015; Sloane, 2017; USPSTF, 2017; Cai 2012; Gupta, 2011; Brown, 1990; Stevens, 2011 2: AHRQ, 2019; Hooton, 2017; Gupta, 2012; Hooton 2012

# Need for New Therapies Effective Against Antibiotic Resistant Pathogens

- Standard of care antibiotics have become less effective due to increased resistance
- Women with uUTIs need new, safe and effective treatments that can be used empirically with confidence
  - Clearly, point of care diagnostics will play an important role in the future in being able to select appropriate antibiotic therapy

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# Microbiology & Pharmacology Michael Dunne, MD, FIDSA

# Sulopenem Has Broad Activity Against Most Common Organisms in uUTIs

Organism	Region	Year	Ν	MIC <sub>90</sub>
	US-Europe	2016-2017	753	0.03
E. coli	US	2019	983	0.03
	US	2023	635	0.03
	<b>US-Europe</b>	2016-2017	303	0.12
K. pneumoniae	US	2019	273	0.06
	US	2023	163	0.06
	US-Europe	2016-2017	75	0.06
K. oxytoca	US	2019	41	0.06
-	US	2023	31	0.06
V. aaraganaa	US	2019	33	0.25
K. aerogenes	US	2023	22	0.25
	US-Europe	2016-2017	150	0.25
P. mirabilis	US	2019	91	0.25
	US	2023	70	0.5
S. saprophyticus	US-Europe	2016-2017	61	0.25

IHMA Surveillance Data from 2016-2017 (hospital isolates from UTI and IAI infections); JMI Surveillance Data from 2019 and 2023

### Activity of Sulopenem Consistent with Currently-Marketed Carbapenems

	<b>E. coli</b> N = 635		-	<i>K. pneumoniae</i> N = 163		<i>P. mirabilis</i> N = 70	
	MIC <sub>90</sub>	Resistant	MIC <sub>90</sub>	Resistant	MIC <sub>90</sub>	Resistant	
Sulopenem <sup>1</sup>	0.03	-	0.06	-	0.5	-	
Imipenem <sup>1</sup>	≤0.12	0.2%	0.25	0.6%	4	78.6%	
Meropenem <sup>1</sup>	0.03	0.2%	0.03	0.6%	0.12	0%	
Ertapenem <sup>2</sup>	0.03	0.3%	0.06	1.8%	0.015	0%	

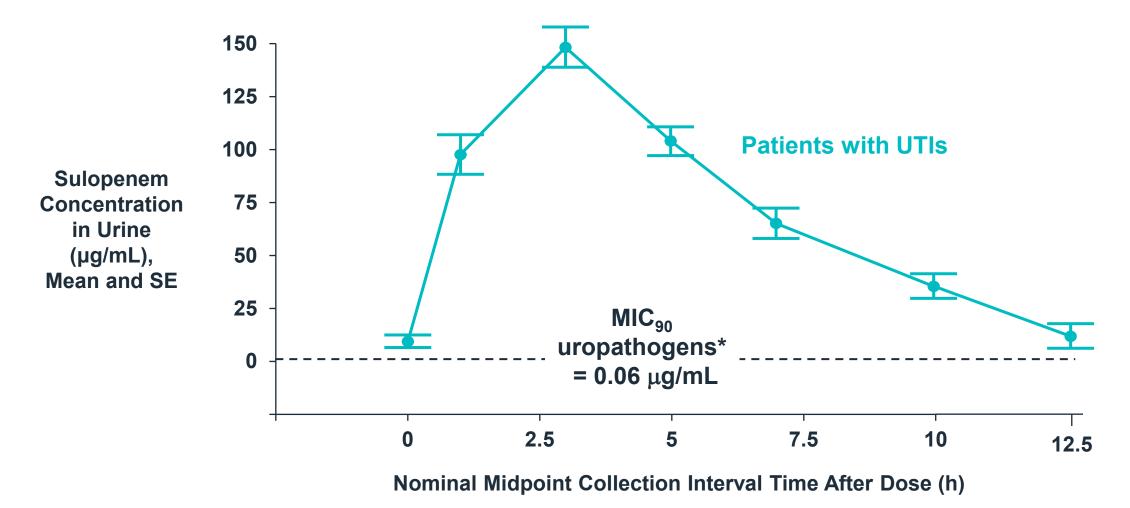
1. JMI Surveillance Data 2023; 2. JMI Surveillance Data 2019 (E. coli N=983, K. pneumoniae N=273, P. mirabilis N=91)

# **Sulopenem Pharmacokinetics**

- Rapidly distributed to tissues; Plasma protein binding is ~ 11%
- Metabolism primarily result of hydrolysis of the β-lactam ring
- Urinary excretion predominant route of elimination
- $T_{1/2}$ : 1.1 hour in plasma
- Food increases bioavailability of bilayer tablet from 40% to 60%
- Probenecid increases exposure of sulopenem by ~ 50%
- No inhibition or induction of P450 enzymes
- Sulopenem is an avid substrate of OAT3
  - Explains effect of probenecid on sulopenem
  - Neither a substrate or inhibitor of other efflux transporters
- Sulopenem etzadroxil rapidly converted to sulopenem

### Sulopenem Concentrations in Urine Exceed MIC<sub>90</sub> of Target Uropathogens for 100% of Dosing Interval After Oral Dosing

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# Oral Sulopenem is Not Associated with Clinically Relevant Drug-Drug Interactions

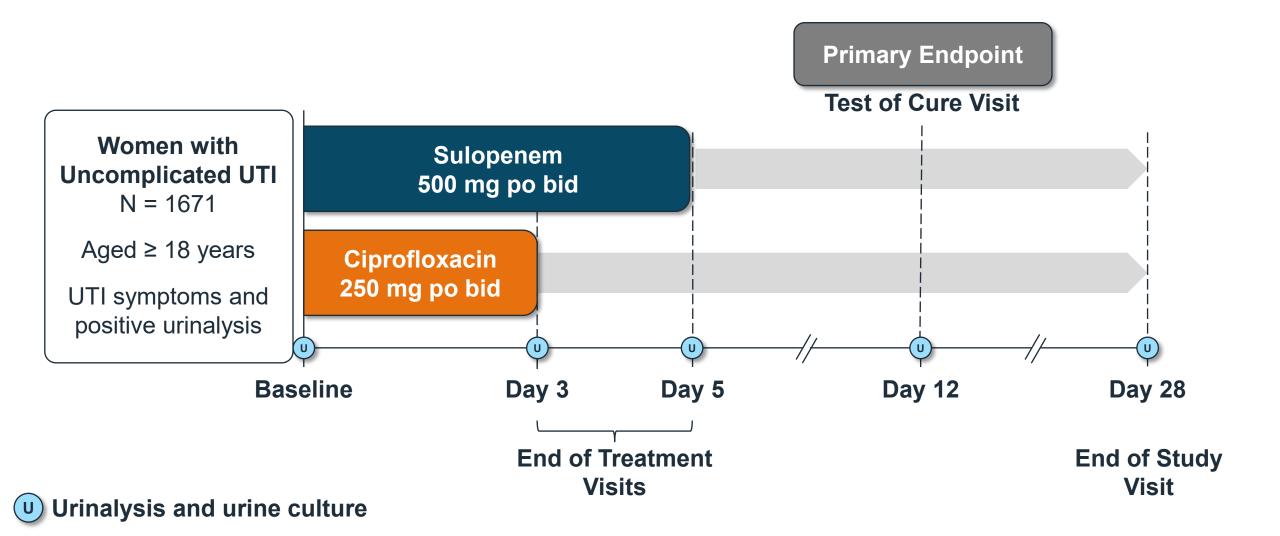
- In vitro studies support a low likelihood of clinically relevant DDIs
  - No interaction between itraconazole and oral sulopenem
- With oral sulopenem bilayer tablet, valproic acid (VPA) levels > 90% relative to baseline when dosed
  - Unexpected, as penems usually lead to decreased VPA levels
  - Beneficial effect with sulopenem etzadroxil possibly due to probenecid
  - Can be safely administered to patients with seizure disorder

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# Efficacy of Oral Sulopenem in Uncomplicated UTIs

Study 301 Study 310

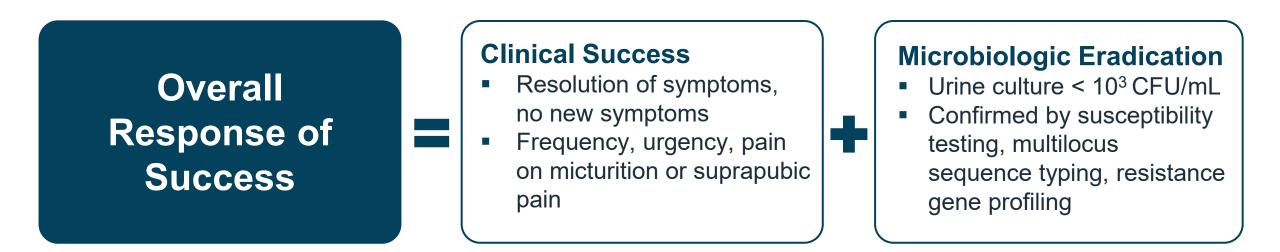
# Study 301: Randomized, Multicenter, Double-Blind, Active-Controlled Study



# Study 301: Primary Endpoint

#### **Primary Endpoint:**

Proportion of patients achieving an overall response of success at Day 12 test of cure (TOC) visit

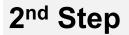


# **Study 301: Key Secondary Endpoints**

- Overall Response at Day 5 (End of Treatment)
- Clinical success at Day 12 (TOC)
- Microbiologic eradication at Day 12 (TOC)
- Investigator's Assessment of clinical success at Day 12 (TOC)
- Overall Response at Day 28 (End of Study)
- Safety

# Study 301: Pre-Specified Hierarchical Testing Method of Primary Endpoint

Analysis	Populations			
1 <sup>st</sup> Step	<ul> <li>micro-MITTR Superiority of oral sulopenem vs ciprofloxacin in patients with uropathogen non-susceptible to ciprofloxacin</li> <li>OR 1</li> <li>micro-MITTS Non-inferiority of oral sulopenem vs ciprofloxacin in patients with uropathogen susceptible to ciprofloxacin</li> </ul>			



**micro-MITT** Non-inferiority of oral sulopenem vs ciprofloxacin in uUTI patients with  $\geq 10^5$  CFU/mL of Enterobacterales at baseline

Dunne, et al. Clinical Infectious Diseases 2023 Jan 6; 76(1):66-77

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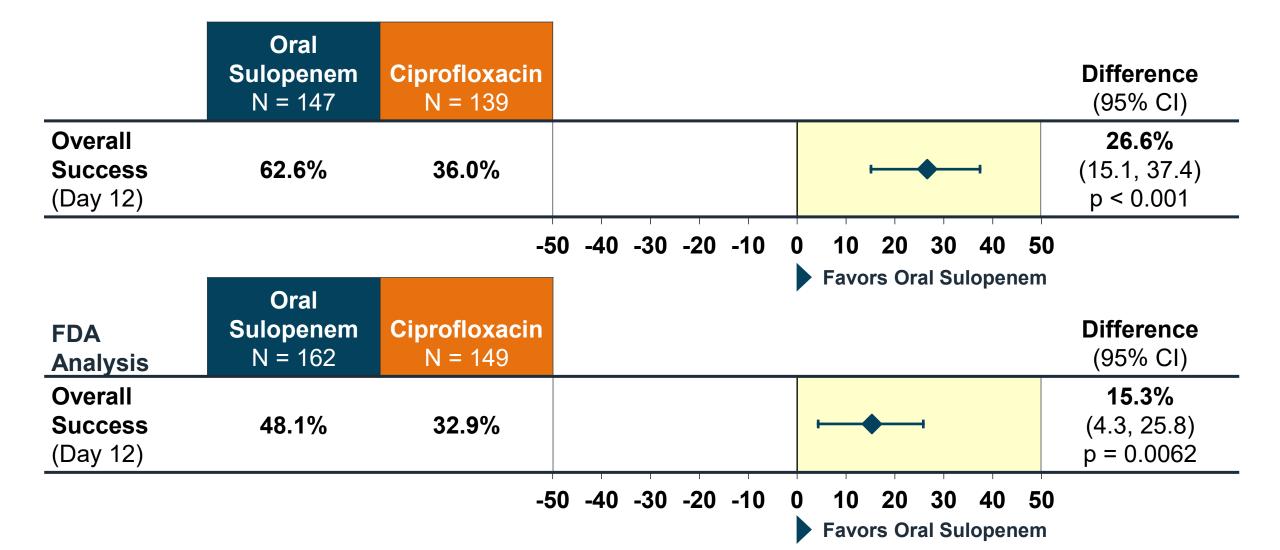
# **Study 301: Study Disposition**

	Oral Sulopenem	Ciprofloxacin
Intent-to-treat (ITT)	835	836
Safety Received study drug	833	827
Modified ITT (MITT) Received study drug and uUTI symptoms	785	794
<b>micro-MITT, (%)</b> n Uropathogen <u>&gt;</u> 10⁵ CFU/mL	<b>66%</b> (517)	<b>70%</b> (554)
micro-MITTS, (%) n Susceptible to ciprofloxacin	<b>47%</b> (370)	<b>52%</b> (415)
micro-MITTR, (%) n Non-susceptible to ciprofloxacin	<b>19%</b> (147)	<b>18%</b> (139)

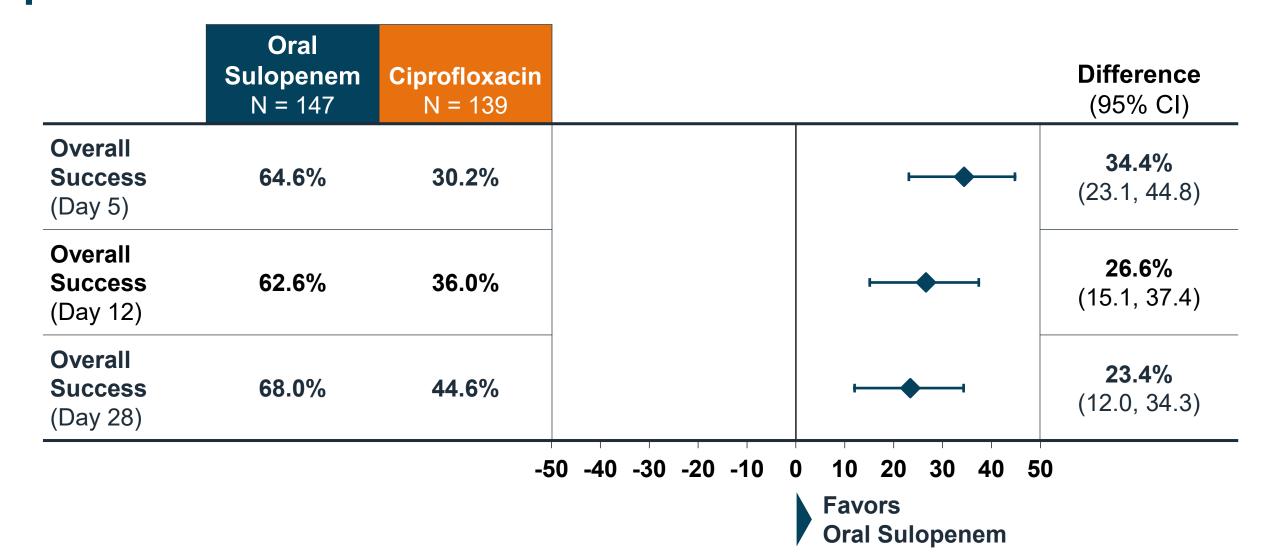
#### Study 301 micro-MITTR: Baseline Demographics Similar Between Groups

	Oral Sulopenem N = 147	Ciprofloxacin N = 139
Age, years (SD)	<b>55</b> (19.3)	<b>56</b> (20.1)
White	88%	91%
Black	10%	9%
Hispanic / Latinx	40%	38%
US	55%	59%
Diabetes mellitus	17%	19%
<b>BMI; median</b> (kg/m <sup>2</sup> )	26.3	27.5
Creatinine clearance; median (mL/min)	69.0	68.0

#### Study 301 micro-MITTR: Oral Sulopenem Statistically Superior to Ciprofloxacin for Overall Success



### Study 301 micro-MITTR: Superiority of Oral Sulopenem Consistent Over Time



### Study 301 micro-MITTR: Consistent Effect in Overall Response Across Baseline Organisms

Pathogen, % (n/N)	Oral Sulopenem	Ciprofloxacin
E. coli	<b>59.1%</b> (75/127)	<b>35.0%</b> (42/120)
K. pneumoniae	<b>71.4%</b> (10/14)	<b>50.0%</b> (8/16)
P. mirabilis	<b>100%</b> (9/9)	<b>50.0%</b> (3/6)

#### Study 301 micro-MITTR: Overall Response of Sulopenem Superior to Ciprofloxacin Among Multidrug Resistant Uropathogens

Resistance	Oral Sulopenem	Ciprofloxacin		Difference (95% CI)
Quinolone	<b>62.6%</b> (92/147)	<b>36.0%</b> (50/139)	<b>⊢</b> •	<b>26.6%</b> (15.1, 37.4)
Quinolone, β-lactam	<b>66.7%</b> (86/129)	<b>35.5%</b> (43/121)	<b></b>	<b>31.1%</b> (18.9, 42.4)
Quinolone, β-lactam, TMP-SMX	<b>60.3%</b> (38/63)	<b>34.0%</b> (16/47)	·•	<b>26.3%</b> (7.40, 43.2)
Quinolone, β-lactam, TMP-SMX, nitrofurantoin	<b>79.2%</b> (19/24)	<b>40.7%</b> (11/27)	• <b>•</b> ••••	<b>38.4%</b> (11.4, 60.1)
		-8	0 -60 -40 -20 0 20 40 60 Favors Oral Sulopenem	80

**CO-41** 

### **Study 301: micro-MITT Population**

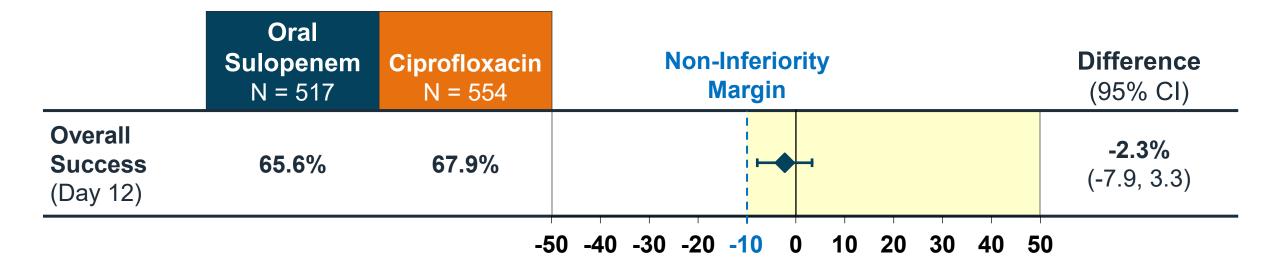
# AnalysisPopulations1st Stepmicro-MITTR Superiority of<br/>oral sulopenem vs ciprofloxacin<br/>in patients with uropathogen<br/>non-susceptible to ciprofloxacinOR1micro-MITTS Non-inferiority<br/>of oral sulopenem vs ciprofloxacin<br/>in patients with uropathogen<br/>susceptible to ciprofloxacinImage: Compatible to ciprofloxacin<br/>susceptible to ciprofloxacin



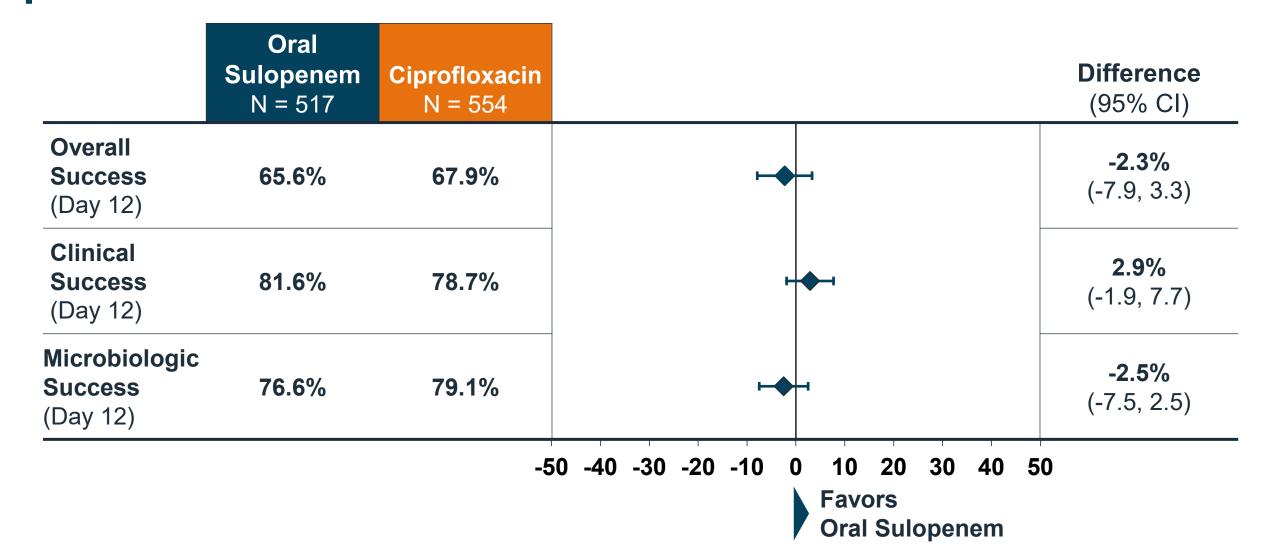
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**micro-MITT** Non-inferiority of oral sulopenem vs ciprofloxacin in uUTI patients with  $\geq 10^5$  CFU/mL of Enterobacterales at baseline

### Study 301 micro-MITT: Oral Sulopenem Non-Inferior for Overall Success Compared with Ciprofloxacin



#### Study 301 micro-MITT: Oral Sulopenem Provides Similar Clinical and Microbiologic Response



#### **Study 301: micro-MITTS Population**

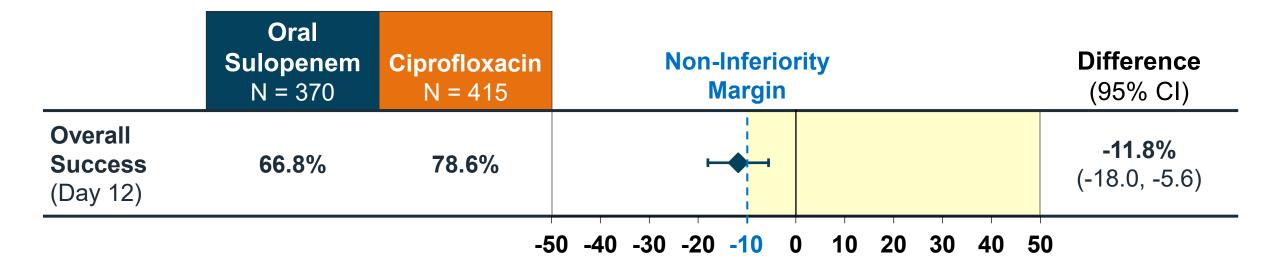
Analysis	Populations
1 <sup>st</sup> Step	<ul> <li>micro-MITTR Superiority of oral sulopenem vs ciprofloxacin in patients with uropathogen non-susceptible to ciprofloxacin</li> <li>OR 1</li> <li>micro-MITTS Non-inferiority of oral sulopenem vs ciprofloxacin in patients with uropathogen susceptible to ciprofloxacin</li> </ul>

2<sup>nd</sup> Step

**micro-MITT** Non-inferiority of oral sulopenem vs ciprofloxacin in uUTI patients with  $\geq 10^5$  CFU/mL of Enterobacterales at baseline

Dunne, et al. Clinical Infectious Diseases 2023 Jan 6;76(1):66-77

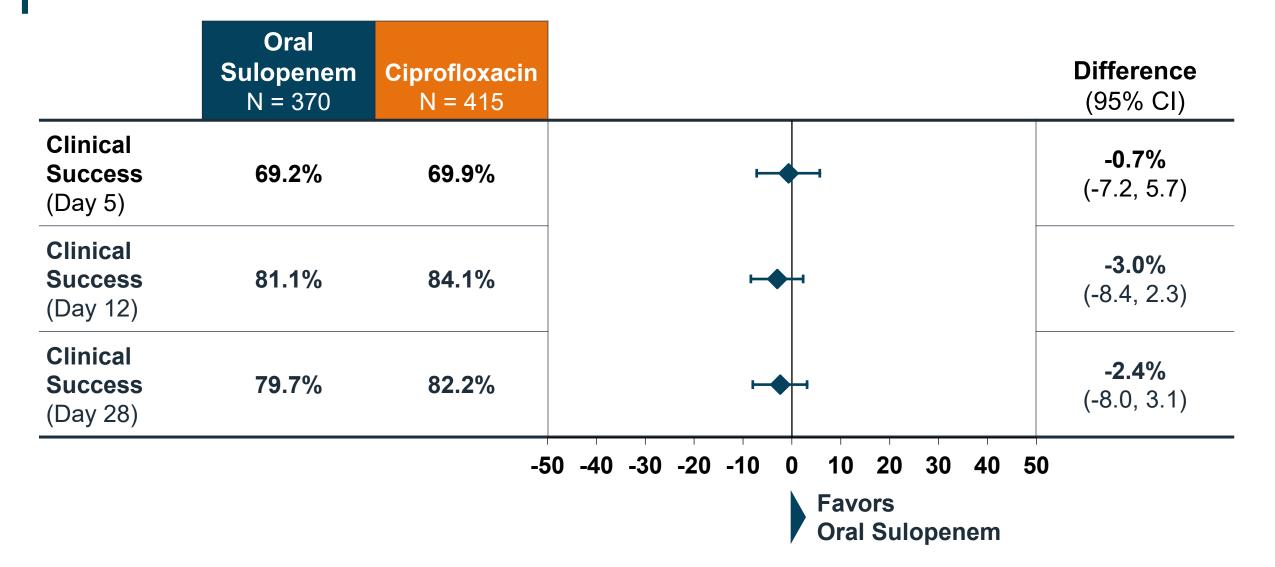
### Study 301 micro-MITTS: Oral Sulopenem Was Not Non-Inferior to Ciprofloxacin for Overall Response



# Study 301 micro-MITTS: Difference in Overall Response Driven by Rate of ASB

	<b>Oral Sulopenem</b> N = 370	<b>Ciprofloxacin</b> N = 415
Non-responders for Overall Success (Day 12)	28.4%	15.7%
Microbiologic failure only, % (n) (asymptomatic bacteriuria, uropathogen ≥ 10 <sup>3</sup> CFU/mL)	<b>12.7%</b> (47)	<b>3.9%</b> (16)
Clinical failure only (no resolution of symptoms)	10.3%	10.1%
Microbiologic and clinical failure only	4.9%	1.0%
Other antibiotic treatment for uUTI only	0.5%	0.7%
Death	0	0

# Study 301 micro-MITTS: Asymptomatic Bacteriuria did Not Lead to Less Clinical Success at Day 28



#### ASB at Day 12 does Not Affect Clinical Failure Rate at Day 28 in Patients Treated with Oral Sulopenem

	Assessment Day 5	Clinical Failure Day 12	p-value
Overall Success	335	31 <b>(9.3%)</b>	1.000
Asymptomatic Bacteriuria	12	1 (8.3%)	1.000
	Assessment Day 12	Clinical Failure Day 28	p-value
Overall Success			p-value 0.128

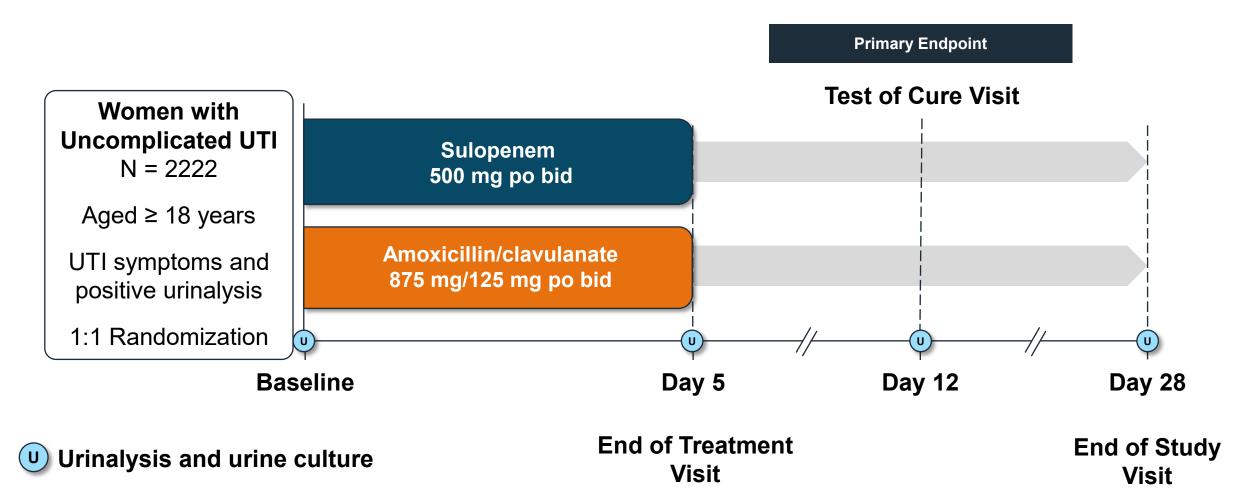
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### Efficacy of Oral Sulopenem in Uncomplicated UTIs

Study 301

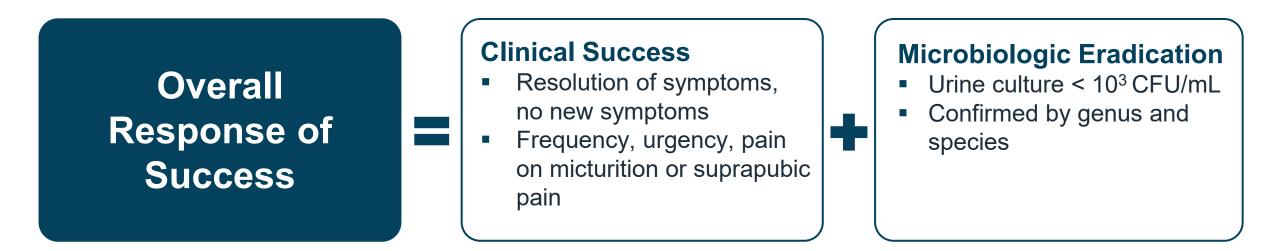
Study 310

# Study 310: Randomized, Multicenter, Double-Blind, Active-Controlled Study



### Study 310: Primary Endpoint

**Primary Endpoint:** Proportion of patients achieving an overall response of success at Day 12 test of cure (TOC) visit



### Study 310: Key Secondary Endpoints

- Overall Response at Day 5 (End of Treatment)
- Clinical success at Day 12 (TOC)
- Microbiologic eradication at Day 12 (TOC)
- Investigator's Assessment of clinical success at Day 12 (TOC)
- Overall Response at Day 28 (End of Study)
- Safety

#### Study 310: Pre-Specified Hierarchical Testing Method of Primary Endpoint

Analysis

#### **Populations**



micro-MITT Non-inferiority of oral sulopenem vs amox/clav in uUTI patients with ≥10<sup>5</sup> CFU/mL of Enterobacterales at baseline



**micro-MITTS** Non-inferiority of oral sulopenem vs amox/clav in patients with uropathogen susceptible to amox/clav\*

2

**micro-MITTR** Superiority of oral sulopenem vs amox/clav in patients with uropathogen non-susceptible to amox/clav

2

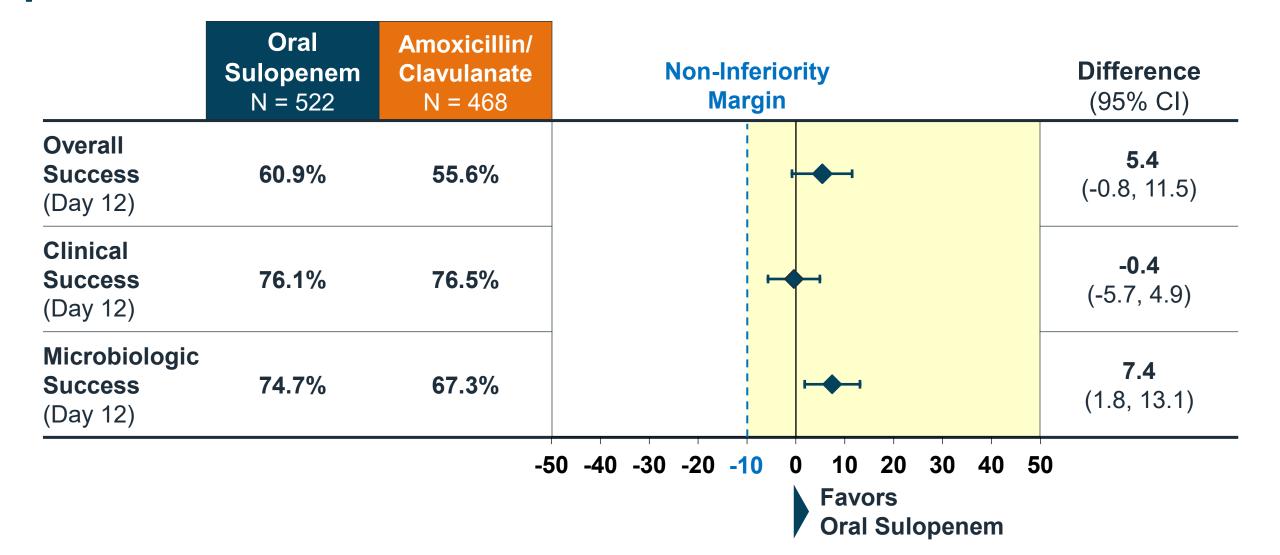
#### **Study 310: Study Disposition**

	Oral Sulopenem	Amoxicillin/Clavulanate
Intent-to-treat (ITT)	1111	1111
Safety / Modified ITT (MITT) Received study drug	1107	1107
<b>micro-MITT, %</b> (n) Uropathogen <u>&gt;</u> 10 <sup>5</sup> CFU/mL	<b>47.0%</b> (522)	<b>42.1%</b> (468)
<b>micro-MITTS, %</b> (n) Susceptible to amoxicillin/clavulanate	<b>43.2%</b> (480)	<b>39.8%</b> (442)
<b>micro-MITTR, %</b> (n) Non-susceptible to amoxicillin/clavulanate	<b>3.8%</b> (42)	<b>2.3%</b> (25)

#### Study 310: micro-MITT: Baseline Demographics Similar Between Groups

	Oral Sulopenem N = 522	Amoxicillin/Clavulanate N = 468
Age: mean (SD) (years)	<b>50.3</b> (17.3)	<b>48.6</b> (17.2)
White	80.3%	79.1%
Black	16.1%	17.9%
Hispanic / Latinx	63.8%	63.2%
US	100%	100%
Diabetes mellitus	16.5%	14.5%
<b>BMI, median</b> (kg/m <sup>2</sup> )	28.1	27.9
Creatinine clearance, median (mL/min)	83.1	83.7

### Study 310: micro-MITT: Sulopenem Demonstrated Non-Inferiority to Amoxicillin / Clavulanate at TOC



#### Study 310: micro-MITT: Reasons for Failure at TOC for Overall Response

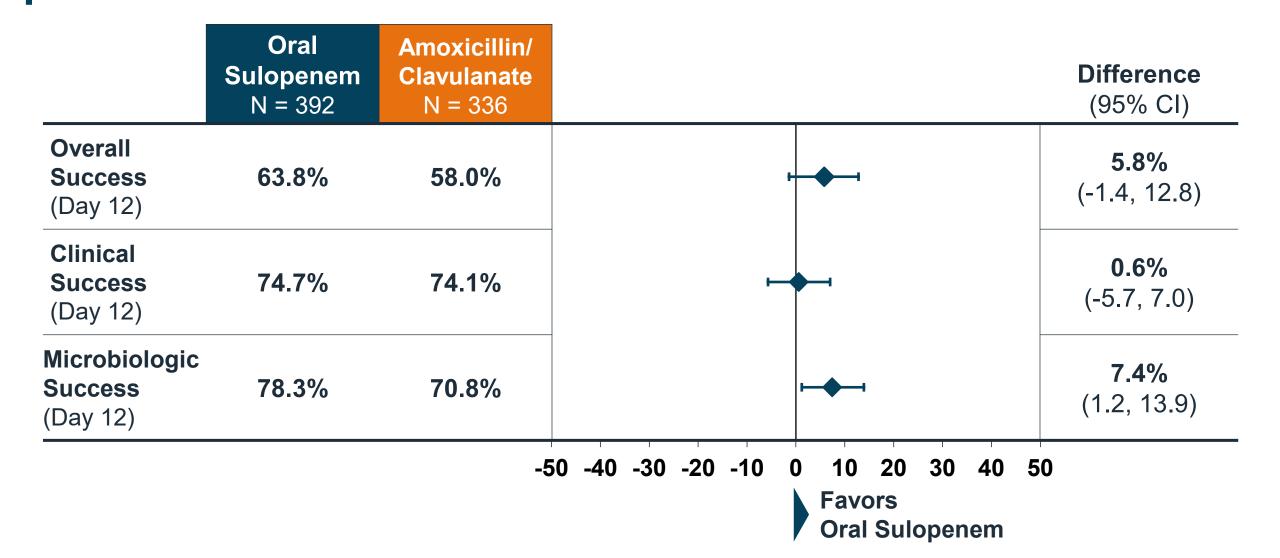
<b>Reasons for Failure at TOC, %</b> (n)	<b>Oral Sulopenem</b> N = 522	<b>Amoxicillin/Clavulanate</b> N = 468
Persistent or new uUTI symptoms only	<b>13.4%</b> (70)	<b>10.7%</b> (50)
Microbiologic failure only (ASB)	<b>14.2%</b> (74)	<b>19.9%</b> (93)
Both uUTI symptoms and microbiologic failure	<b>6.1%</b> (32)	<b>8.1%</b> (38)
Non-study antibacterial therapy for uUTI	<b>1.9%</b> (10)	<b>0.9%</b> (4)

#### Study 310 micro-MITT: ASB at Day 12 does Not Affect Clinical Failure Rate at Day 28 in Patients Treated with Oral Sulopenem

	Assessment Day 5	Clinical Failure Day 12	p-value
Overall Success	272	13 <b>(4.8%)</b>	0.721
Asymptomatic Bacteriuria	30	1 (3.3%)	0.721
	Assessment Day 12	Clinical Failure Day 28	p-value
Overall Success			p-value 0.656

CO-59

#### Study 310: Consistent Effect of Oral Sulopenem in Quinolone Susceptible Population



#### Study 310: Pre-Specified Hierarchical Testing Method of Primary Endpoint

Analysis

#### **Populations**

1<sup>st</sup> Step

**micro-MITT** Non-inferiority of oral sulopenem vs amox/clav in uUTI patients with  $\geq 10^5$  CFU/mL of Enterobacterales at baseline

2<sup>nd</sup> Step

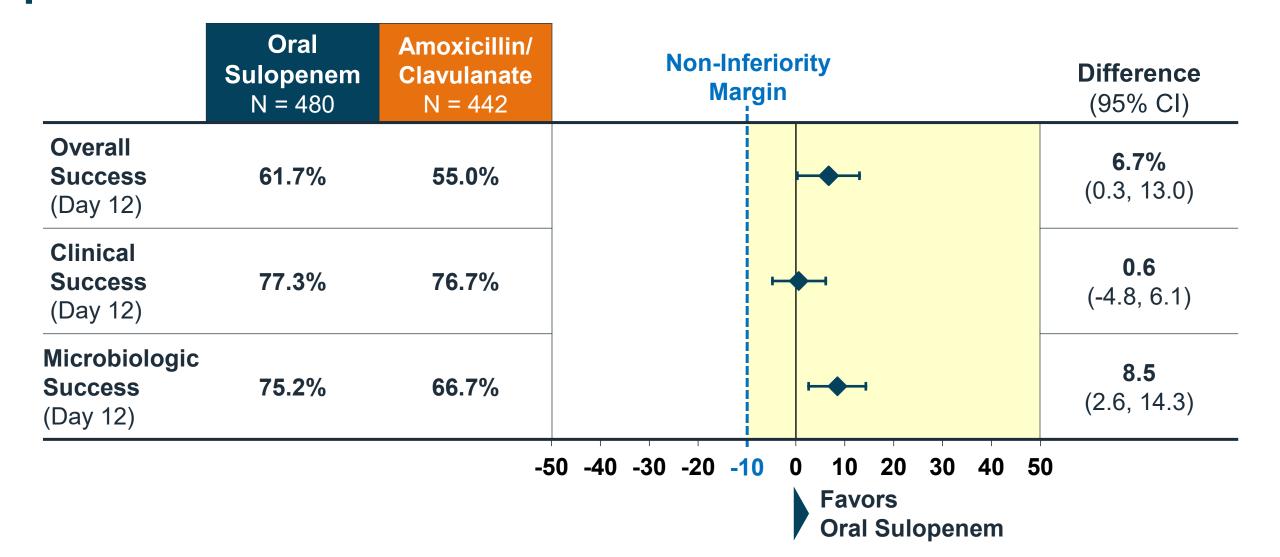
**micro-MITTS** Non-inferiority of oral sulopenem vs amox/clav in patients with uropathogen susceptible to amox/clav\*

**micro-MITTR** Superiority of oral sulopenem vs amox/clav in patients with uropathogen non-susceptible to amox/clav

2

#### Study 310: micro-MITTS: Benefits of Oral Sulopenem Supported by Clinical and Microbiologic Response at TOC

CO-62

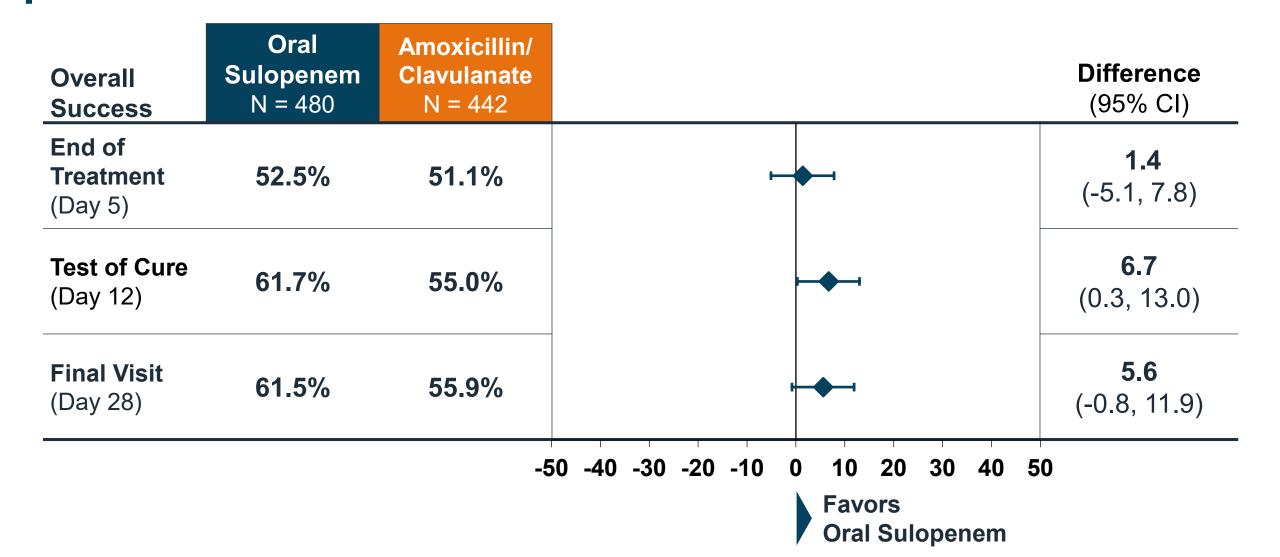


### Study 310: micro-MITTS: Reasons for Failure at TOC for Overall Response

Reasons for Failure at TOC, n (%)	<b>Oral Sulopenem</b> N = 480	Amoxicillin/Clavulanate N = 442
Persistent or new uUTI symptoms only	13.1%	10.6%
Microbiologic failure only (ASB)	<b>14.6%</b> (70)	<b>20.6%</b> (91)
Both uUTI symptoms and microbiologic failure	5.4%	7.9%
Non-study antibacterial therapy for uUTI	1.7%	0.9%

#### Study 310: micro-MITTS: Oral Sulopenem Overall Response Non-Inferior to Amoxicillin/Clavulanate at Every Visit

**CO-64** 



#### Study 310 micro-MITTS: Consistent Overall Response for Oral Sulopenem by Major Pathogens at Baseline

Pathogen, % (n/N)	<b>Oral Sulopenem</b> N = 480	Amoxicillin / Clavulanate N = 442
E. coli	<b>62.8%</b> (251/400)	<b>56.1%</b> (210/374)
K. pneumoniae	<b>54.4%</b> (31/57)	<b>44.0%</b> (22/50)
P. mirabilis	<b>38.5%</b> (5/13)	<b>46.2%</b> (6/13)

#### Study 310: Pre-Specified Hierarchical Testing Method of Primary Endpoint

Analysis

#### **Populations**



Micro-MITT Non-inferiority of oral sulopenem vs amox/clav in uUTI patients with ≥10<sup>5</sup> CFU/mL of Enterobacterales at baseline

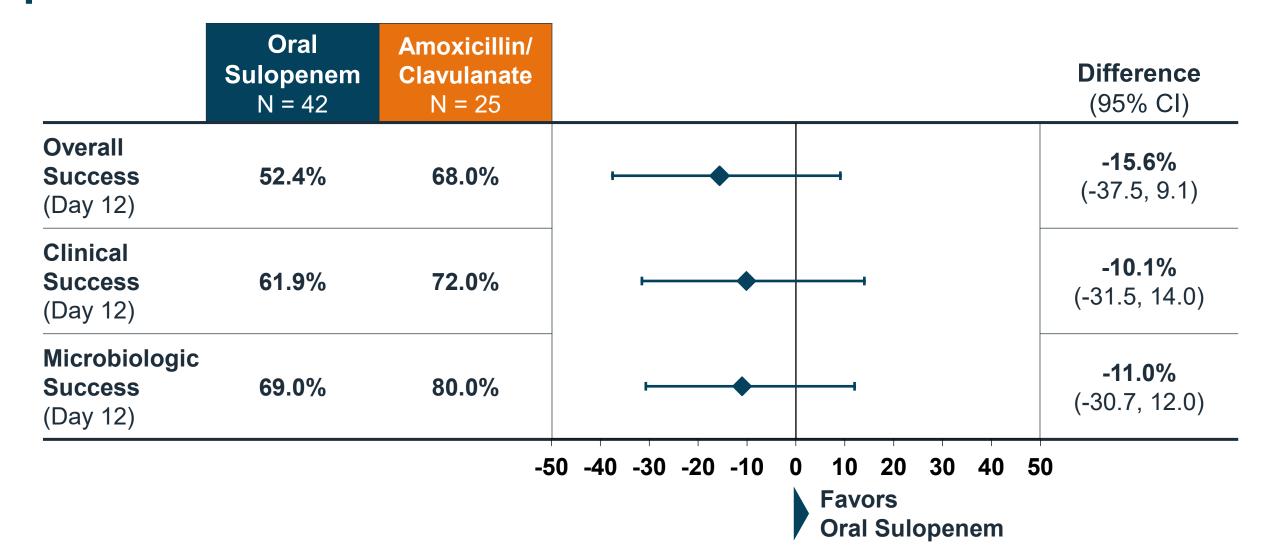


**micro-MITTS** Non-inferiority of oral sulopenem vs amox/clav in patients with uropathogen susceptible to amox/clav\*

2

**micro-MITTR** Superiority of oral sulopenem vs amox/clav in patients with uropathogen non-susceptible to amox/clav

### Study 310 micro-MITTR: Small Sample Size Limits Ability to Draw Conclusions Based on Treatment Effect



#### Oral Sulopenem is Effective Oral Antibiotic Treatment Option for Women with uUTI

Overall Success	<b>Study 301</b> Oral Sulopenem vs Ciprofloxacin	<b>Study 310</b> Oral Sulopenem vs Amoxicillin/Clavulanate	
micro-MITT	Non-inferior	Non-inferior	
micro-MITTR	Superior	N/A Limited sample size	
Micro-MITTSNot non-inferiorDriven by difference in ASB rate		Superior	

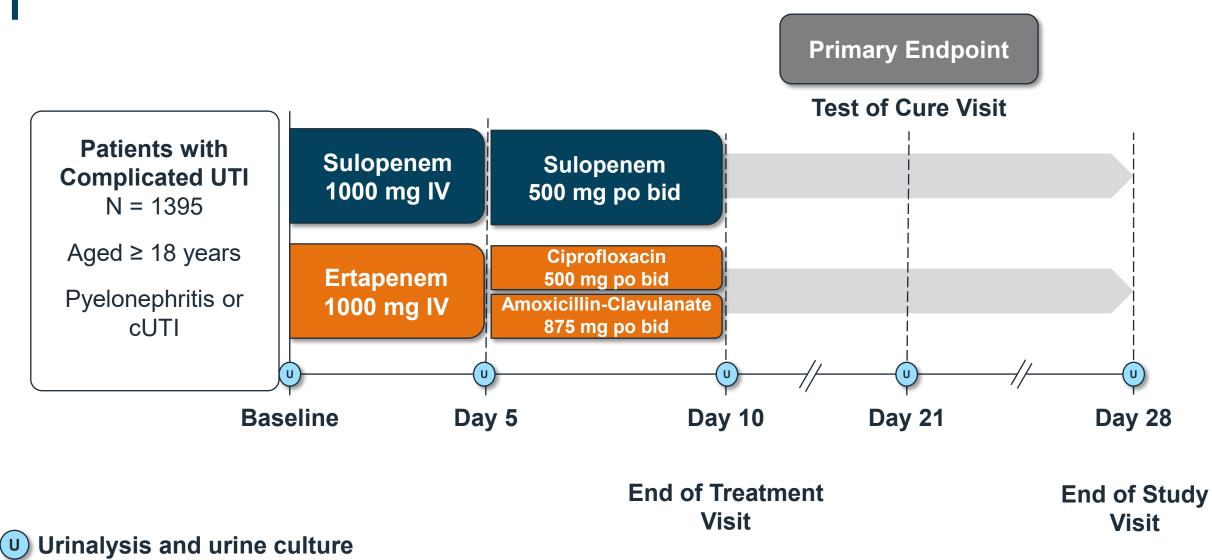
#### Study 301 and 310: Clinical Success Consistently Seen with Oral Sulopenem Across All Populations

Study 301	Oral Sulopenem	Ciprofloxacin		Difference (95% CI)
MITT	82.4%	80.4%	<b>⊢</b>	<b>2.1%</b> (-1.8, 5.9)
micro-MITT	81.6%	78.7%	<b>⊢</b>	<b>2.9%</b> (-1.9, 7.7)
micro-MITTR	83.0%	62.6%	<b>⊢</b>	→ <b>20.4</b> (10.2, 30.4)
micro-MITTS	81.1%	84.1%		<b>-3.0%</b> (-8.4, 2.3)
Study 310	Oral Sulopenem	Amoxicillin/ Clavulanate		
MITT	76.9%	76.7%	<b>⊢</b>	<b>0.2%</b> (-3.3, 3.7)
micro-MITT	76.1%	76.5%	<b></b>	<b>-0.4%</b> (-5.7, 4.9)
micro-MITTR	61.9%	72.0%	<	<b>-10.1%</b> (-31.5, 14.0)
micro-MITTS	77.3%	76.7%	<b>⊢</b>	<b>0.6%</b> (-4.8, 6.1)
		-3	0 -20 -10 0 10 20 Favors Oral Sulo	30 penem

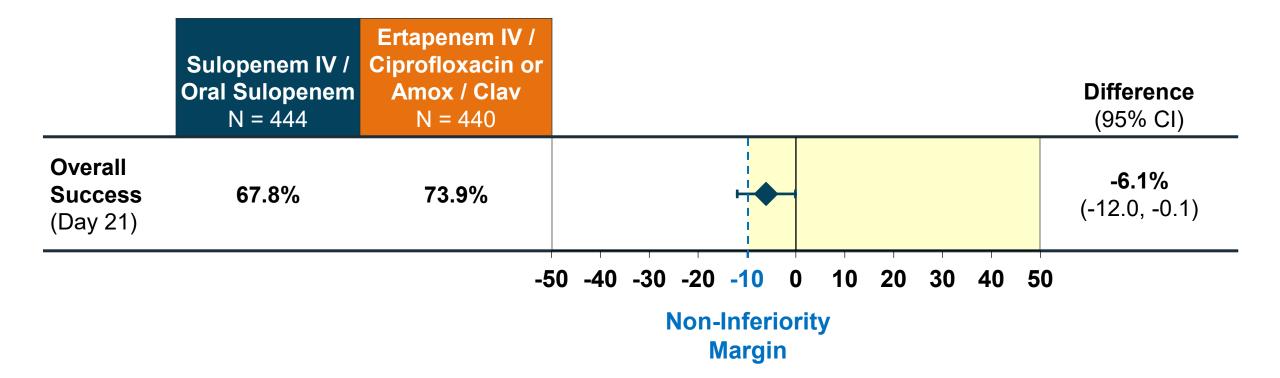
### **Study 302: Complicated Urinary Tract Infection**

Study 301	Study 310	Study 302	Study 303
<b>Uncomplicated UTI</b>	Uncomplicated UTI	<b>Complicated UTI</b>	<b>Complicated IAI</b>
N = 1671	N = 2222	N = 1395	N = 674
Oral Sulopenem VS Ciprofloxacin	Oral Sulopenem VS Amoxicillin / Clavulanate	IV Sulopenem / Oral Sulopenem VS IV Ertapenem / Ciprofloxacin or Amoxicillin / Clavulanate	IV Sulopenem / Oral Sulopenem VS IV Ertapenem / Ciprofloxacin + Metronidazole or Amoxicillin / Clavulanate
Primary Endpoint	Primary Endpoint	Primary Endpoint	Primary Endpoint
Clinical and microbiologic	Clinical and microbiologic	Clinical and microbiologic	Clinical success
success at Day 12	success at Day 12	success at Day 21	at Day 28

# Study 302: Randomized, Multicenter, Double-Blind, Double-Dummy Study



# Study 302 micro-MITT: Sulopenem Not Non-Inferior to Ertapenem for Overall Response



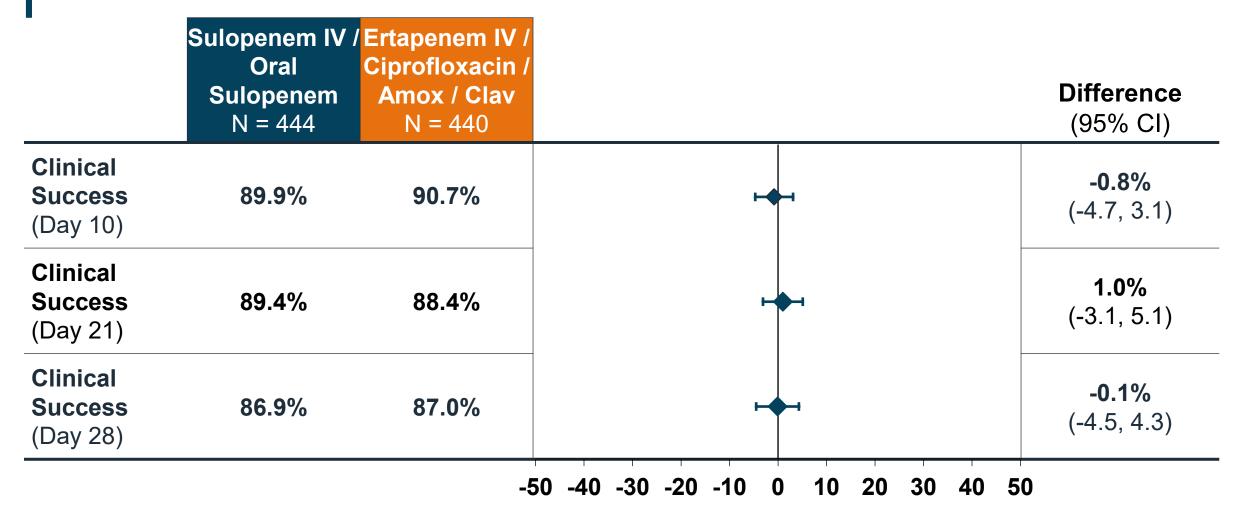
#### **Primary Endpoint:**

Proportion of patients achieving Overall Response at Day 21 test of cure visit with no rescue antibacterial therapy (micro-MITT)

# Study 302 micro-MITT: Overall Response Driven by Rate of ASB

	Sulopenem IV / Oral Sulopenem N = 444	Ertapenem IV / Ciprofloxacin or Amox / Clav N = 440
Non-responders for Overall Success	28.4%	21.1%
Microbiologic failure only, % (n) (asymptomatic bacteriuria, uropathogen ≥ 10 <sup>3</sup> CFU/mL)	<b>20.9%</b> (93)	<b>13.4%</b> (59)
Clinical failure only (no resolution of symptoms)	4.1%	4.8%
Microbiologic and clinical failure	2.5%	1.8%
Other antibiotic treatment for uUTI	1.6%	1.4%
Death	0	0

# Study 302 micro-MITT: Asymptomatic Bacteriuria Not Associated With Less Clinical Success



# Study 302: Overall Response and Rate of ASB by Stepdown Category

	Sulopenem IV / Oral Sulopenem N = 444		Ertapenem IV +/- Ciprofloxacin or Amox / Clav N = 440		r Amox / Clav
<b>Overall Success (TOC)</b>	67.	.8%		73.9	)%
Difference (95% CI)		<b>-6.1%</b> (-12.0, -0.1)			
Non-response: ASB	20.	20.9%		13.4%	
	Sulopenem IV / Oral Sulopenem N = 248	Ertapenem IV / Ciprofloxacin N = 215	Suloper Oral Sulo N =	openem	
Overall Success (TOC)	67.7%	86.5%	67.9	9%	61.8%
Difference (95% CI)	<b>-18.8</b> (-26.1, -11.0) <b>6.1</b> (-3.1,15.0)		.1,15.0)		
Non-response: ASB	21.8%	4.7%	19.9	9%	21.8%

#### Study 302 (mMITT): Overall Success at TOC using Genus and Species to Determine Response by Stepdown Category

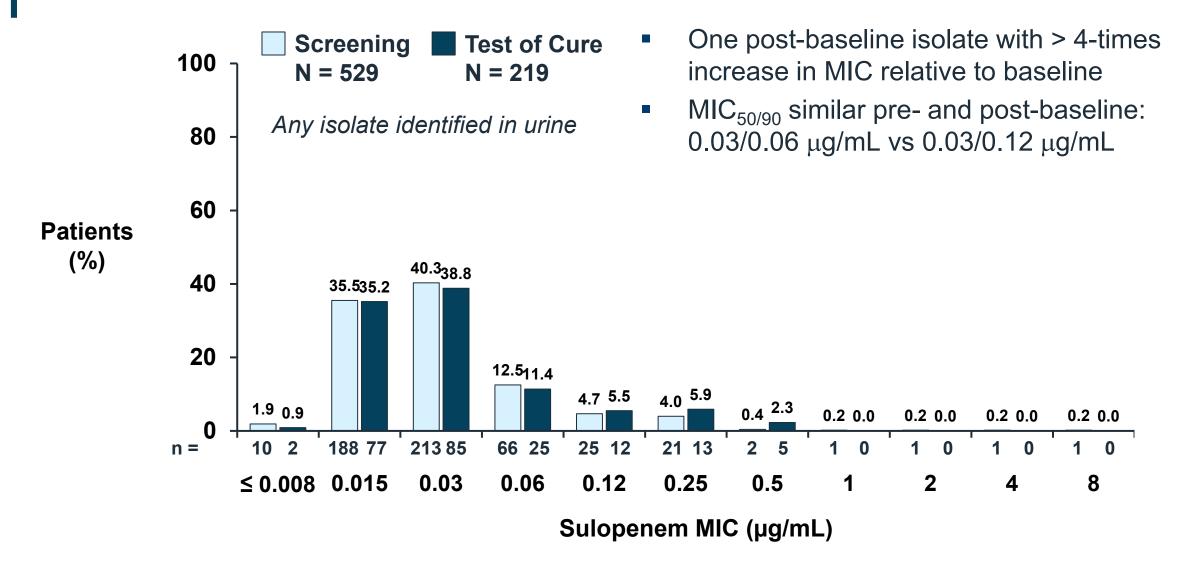
<b>Overall Success</b> (Day 21)	Sulopenem N = 444	Ertapenem N = 440	Difference (95% CI)
Sulopenem IV Only Ertapenem IV Only	<b>50.0%</b> (27/54)	<b>51.8%</b> (73/141)	- <b>1.8%</b> (-17.2, 13.7)
Sulopenem IV to PO Ertapenem IV Only	<b>60.8%</b> (233/383)	<b>51.8%</b> (73/141)	<b>9.1%</b> (-0.5, 18.6)
Cipro and Amox/Clav Resistant Pathogen	<b>66.3%</b> (53/80)	<b>54.7%</b> (58/106)	<b>11.5%</b> (-2.8, 25.2)
-6 patients with a resistant baseline -6 pathogen who stepped down to oral sulopenem versus 106 patients who needed to remain on IV ertanenem due to resistance		o oral o needed	-20 0 20 40 60 Favors Sulopenem

to remain on iv enapenem due to resistance

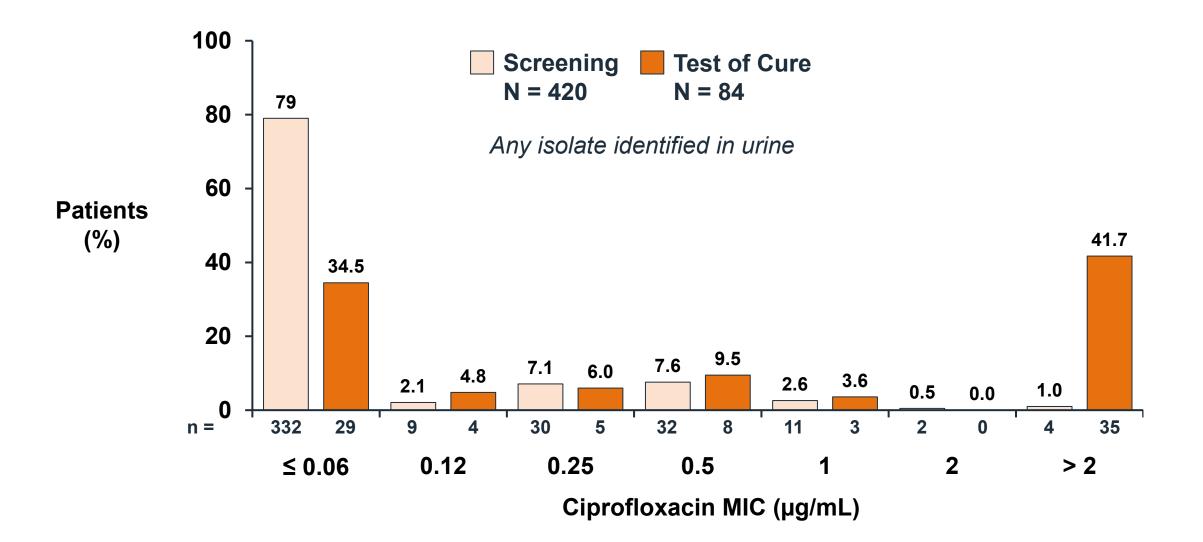
## **Development of Resistance**

Studies 301 and 310

# Study 301 micro-MITT: Sulopenem Treatment Does Not Select for Penem-Resistant Organisms

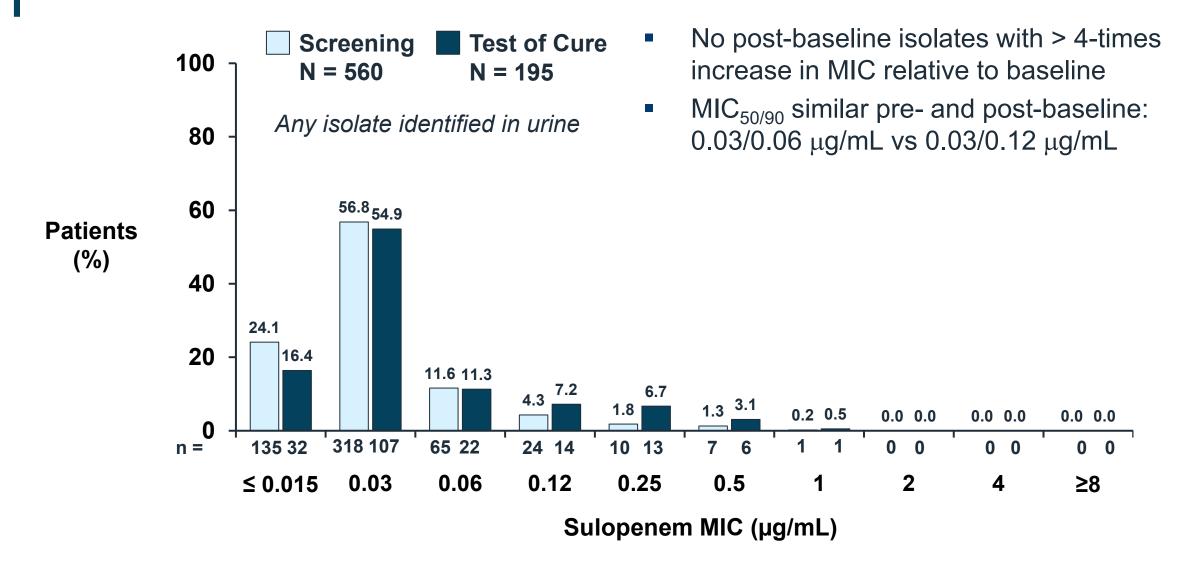


# Study 301: Uropathogens Resistant to Ciprofloxacin Identified in micro-MITTS Population after Treatment



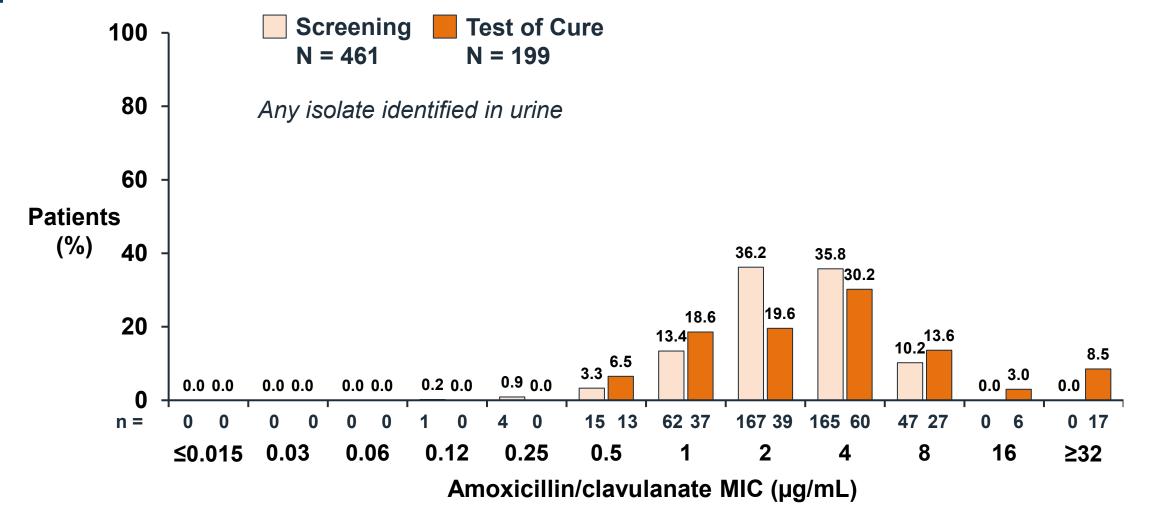
CO-79

# Study 310 micro-MITT: Sulopenem Treatment Does Not Select for Penem-Resistant Organisms



CO-80

#### Study 310: Uropathogens Resistant to Amoxicillin/Clavulanate Identified in micro-MITTS Population after Treatment



# Safety

#### Steven I. Aronin, MD, FACP, FIDSA

Senior VP and Head of Clinical Development Iterum Therapeutics

# **Phase 3 Safety Data Pooled Across Four Studies**

	Phase 3 Integrated <sup>1</sup>		Phase 3 ul	JTI Studies <sup>2</sup>
	Oral / IV Oral / IV Sulopenem Comparators		Oral Sulopenem	Comparators
Safety Population	2970	2964	1940	1934

- Safety profile for oral sulopenem consistent across phase 3 studies
- No new safety signals identified beyond those associated with β-lactams

<sup>1</sup> Includes all patients randomized to studies 301, 302, 303 and 310; <sup>2</sup> Includes Studies 301 and 310

# Phase 3 uUTI Studies: Oral Sulopenem Has a Similar Safety Profile as Comparators

	<b>Oral Sulopenem</b> N = 1940	<b>Comparator</b> N = 1934
Any AE	<b>21.6%</b> (419)	<b>13.0%</b> (252)
Treatment emergent AE (TEAE)	<b>21.4%</b> (416)	<b>13.0%</b> (251)
Drug related TEAE	<b>15.3%</b> (297)	<b>7.0%</b> (136)
<b>TEAE</b> leading to treatment discontinuation	<b>1.1%</b> (21)	<b>0.6%</b> (12)
TEAE leading to study discontinuation	<b>0.4%</b> (7)	<b>0.2%</b> (4)
Serious AE	<b>0.3%</b> (6)	<b>0.4%</b> (7)
Death	<b>0.1%</b> (1*)	<b>0%</b> (0)

\*Cause of death was poorly differentiated adenocarcinoma of lung >5 months after study period in Study 301 patient

# Phase 3 uUTI Studies: Most Common Adverse Events Occurring in > 1% of Patients

	<b>Oral Sulopenem</b> N = 1940	<b>Comparator</b> N = 1934
Diarrhea	<b>8.9%</b> (172)	<b>3.1%</b> (59)
Nausea	<b>4.1%</b> (80)	<b>3.2%</b> (62)
Headache	<b>2.2%</b> (42)	<b>1.8%</b> (35)
Vomiting	<b>1.5%</b> (29)	<b>0.8%</b> (15)
Loose stools	<b>1.3%</b> (26)	<b>0.4%</b> (8)
Vulvovaginal mycotic infection	<b>1.0%</b> (20)	<b>0.3%</b> (6)

### Phase 3 uUTI Studies: Diarrhea Events Were Mild, Selflimited, and Did Not Lead to Treatment Discontinuation

	<b>Oral Sulopenem</b> N = 1940	<b>Comparator</b> N = 1934
Diarrhea	<b>8.9%</b> (172)	<b>3.1%</b> (59)
Treatment discontinuation	<b>0.3%</b> (5)	<b>0.2%</b> (3)
Duration, mean days (SD)	<b>3.9</b> (2.8)	<b>2.8</b> (1.7)
<b>Clostridioides difficile infections</b>	0	<b>0.05%</b> (1)

• No *Clostridioides difficile* infections were observed in patients treated with sulopenem

# Phase 3 uUTI Studies: Treatment Related Adverse Events Leading to Discontinuation

	<b>Oral Sulopenem</b> N = 1940	<b>Comparator</b> N = 1934
AE leading to treatment discontinuation	<b>0.9%</b> (17)	<b>0.5%</b> (9)
Nausea	<b>0.3%</b> (5)	<b>0.3%</b> (5)
Diarrhea	<b>0.2%</b> (4)	<b>0.2%</b> (3)
Vomiting	<b>0.2%</b> (3)	<b>0.2%</b> (3)
Dizziness	<b>0.2%</b> (3)	<b>0.1%</b> (1)
Gastro-esophageal reflux disease	<b>0.2%</b> (3)	0
Abdominal pain	<b>0.1%</b> (2)	<b>0.1%</b> (1)
Headache	<b>0.1%</b> (1)	<b>0.1%</b> (2)

# Phase 3 uUTI Studies: Clinically Significant Liver Function Test Elevations Uncommon

		Oral Sulopenem	Comparators
<b>%</b> (n)		Normal at BL N = 1654	<b>Normal at BL</b> N = 1650
	> ULN to 3x ULN	<b>1.4%</b> (23)	<b>1.2%</b> (19)
ALT	> 3x to 5x ULN	<b>0.1%</b> (2)	0
	> 5x to 10x ULN	<b>&lt;0.1%</b> (1)	<b>&lt;0.1%</b> (1)
		Normal at BL N = 1552	<b>Normal at BL</b> N = 1559
	> ULN to 3x ULN	<b>1.2%</b> (19)	<b>1.1%</b> (17)
AST	> 3x to 5x ULN	<b>&lt;0.1%</b> (1)	0
	> 5x to 10x ULN	<b>0.1%</b> (2)	0

- No ALT / AST elevations of > 10x ULN
- No cases fulfilled Hy's Law criteria

## Study 302 Hy's Law Patient: LFT Abnormalities Attributed to Interaction Between IV Sulopenem and Valproic Acid Receiving IV Sulopenem with Complicated UTI

- 75-year-old man with a cUTI without pyelonephritis
- Received 5 days of IV sulopenem and 2 days of oral sulopenem
- Concomitant medications included valproic acid (300 mg BID)

TEST	Normal Range	Screening	Day 5 (end IV sulopenem)	Day 10 (EOT) (including 2 days of oral sulopenem)	Day 21 (TOC)
ALT	6-41 U/L	11	269	45	12
AST	9-34 U/L	18	313	19	13
GGT	11-52 U/L	35	229	143	98
AP	37-116 U/L	73	174	130	104
Bilirubin	0.10-1.10 mg/dL	0.70	2.77	1.10	1.13

# Hy's Law Patient: LFT Abnormalities Attributed to Interaction Between IV Sulopenem and Valproic Acid

Test	Screening	Day 5	EOT
Valproic acid concentrations* (ng/mL)	54,800	21,000	50,600

- VPA levels decreased as anticipated after IV Sulopenem
- Presumably metabolite of VPA increased and is responsible for increase in LFTs<sup>1</sup>
- Elevated LFTs resolved upon discontinuation of sulopenem

# **Safety Conclusions**

- Well tolerated relative to comparators
- No new safety signals beyond those known for β-lactams
- Diarrhea was most common AE
  - Mild, self-limited and generally did not lead to discontinuation
  - No C. difficile infections were observed
- No increased risk in elderly patients

### **Benefit-Risk**

#### Michael Dunne, MD, FIDSA

### Increasing Resistance to Standard of Care Antibiotics for Uncomplicated UTI Highlights Need for New Treatment Options

		Percent R	esistance
Antibacterial Agent/Class		<b>Becton</b> <b>Dickinson</b> N = 2,228,515	uUTI Studies (micro-MITT) N = 2,061
Quinolone	• •	20.6%	27.0%
Trimethoprim-sulfamethoxazole	→ H <mark>●</mark> H	23.1%	31.1%
β-lactam		57.5%	47.3%
ESBL+ (ceftriaxone MIC >1 μg/mL)		6.9%	11.9%
Nitrofurantoin		20.2%	16.8%
Quinolone, β-lactam, TMP-SMX, nitrofurantoin		-	3.2%
<ul> <li>Becton Dickinson</li> <li>uUTI Studies</li> </ul>	0 10 20 30 40 50 60 70 Percent (SE) of Isolates Resistant to Agent	0	

# Oral Sulopenem is Effective Oral Antibiotic Treatment Option for Women with uUTI and Has a Favorable Safety Profile

**CO-94** 

	<b>Study 301</b> Oral Sulopenem vs Ciprofloxacin	<b>Study 310</b> Oral Sulopenem vs Amoxicillin/Clavulanate				
Efficacy / Overall Success						
micro-MITT	Non-inferior	Non-inferior				
micro-MITTR	Superior	N/A Limited sample size				
micro-MITTS	<b>Not non-inferior</b> Driven by difference in ASB rate	Superior				
Safety – Phase 3 uUTI Studies Combined						
Any AE	<b>21.6%</b> (419)	<b>13.0%</b> (252)				
TEAE leading to treatment discontinuation	<b>1.1%</b> (21)	<b>0.6%</b> (12)				

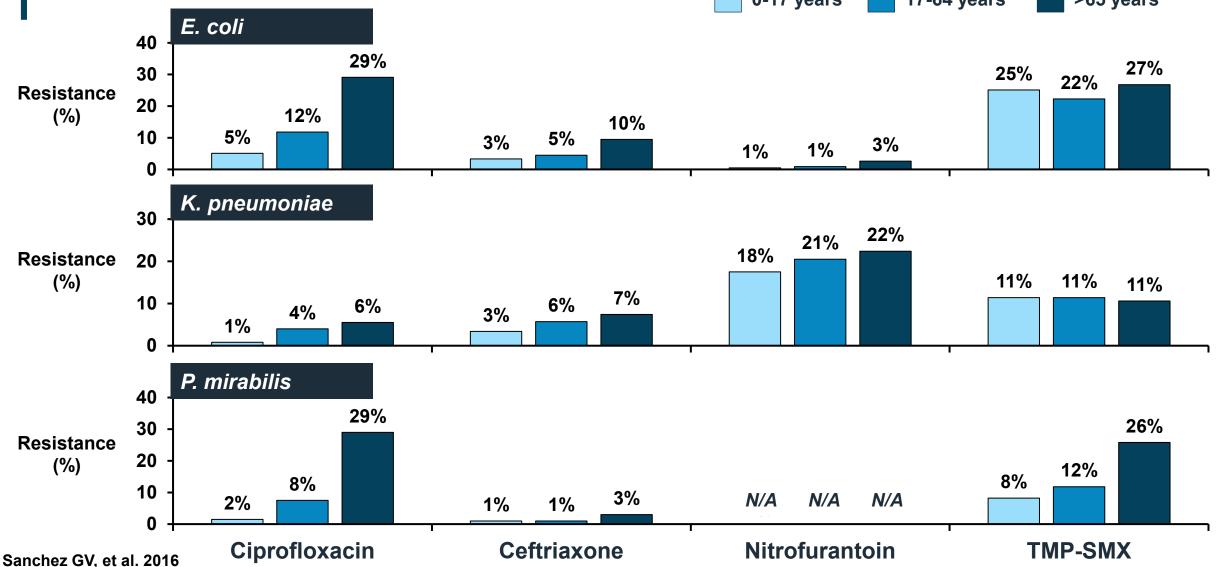
# **Questions Posed to Advisory Committee**

- Is the overall benefit-risk assessment favorable for the use of sulopenem etzadroxil/probenecid for this indication?
- Considering the totality of the evidence in this application, what are considerations that would be important to convey to medical providers to ensure appropriate use of sulopenem etzadroxil/probenecid?

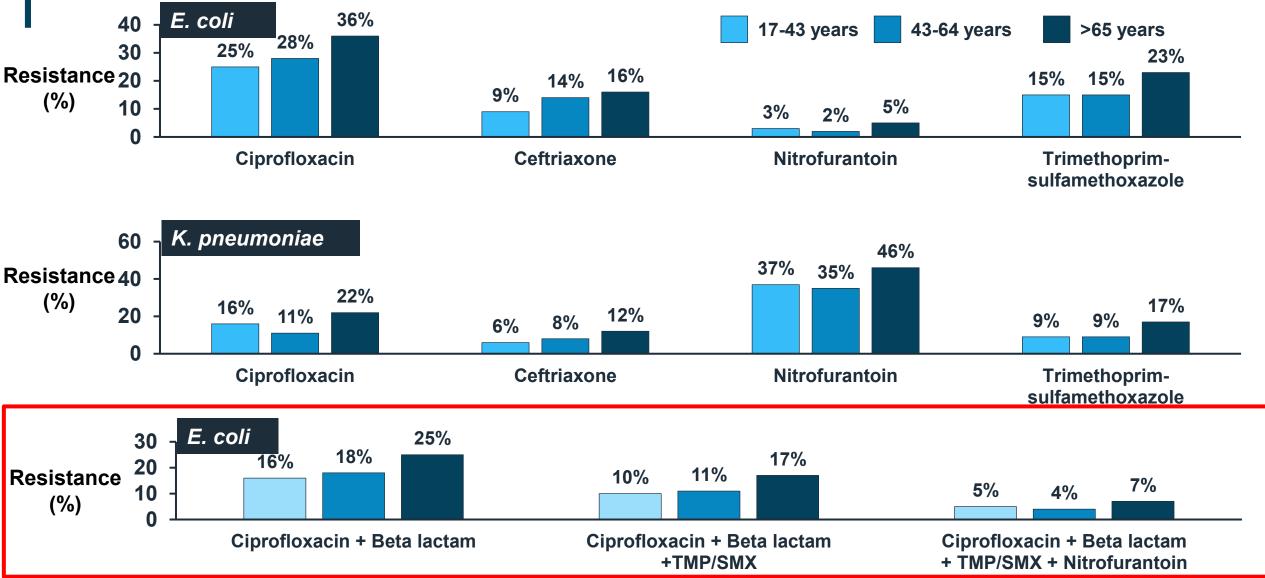
# **Study 301: Characteristics of Patients by Quinolone Susceptibility**

Parameter, % (n) Age, mean (SD)		<b>mMITTS</b> N = 785	<b>mMITTR</b> N = 286 <b>55.4</b> (19.7)	p-value <0.001	
		<b>50.4</b> (18.8)			
Ethnicity	Hispanic or Latinx	<b>23%</b> (184)	<b>39%</b> (111)	<0.001	
	Not Hispanic or Latinx	<b>76%</b> (598)	<b>61%</b> (174)		
	Not reported	<b>0.4%</b> (3)	<b>0.3%</b> (1)		
Region	United States	<b>52%</b> (406)	<b>57%</b> (163)	0.091	
	Not US	<b>48%</b> (379)	<b>43%</b> (123)		
Race	Black or African American	<b>9%</b> (67)	<b>9%</b> (26)		
	Asian	<b>0.8%</b> (6)	<b>0.7%</b> (2)	0.661	
	White	<b>90%</b> (706)	<b>90%</b> (256)		
	Other	<b>0.3%</b> (2)	<b>0.7%</b> (2)		
Diabetes mellitus		<b>12%</b> (91)	<b>19%</b> (53)	0.004	
Body mass index, mean (SD), kg/m <sup>2</sup>		<b>27.5</b> (6.6)	<b>28.5</b> (6.8)	0.008	
Creatinine clearance, mean (SD), mL/min		<b>78.4</b> (26.2)	<b>72.7</b> (28.2)	0.001	

# Antibiotic Resistance Increases with Age Among US Female Outpatients



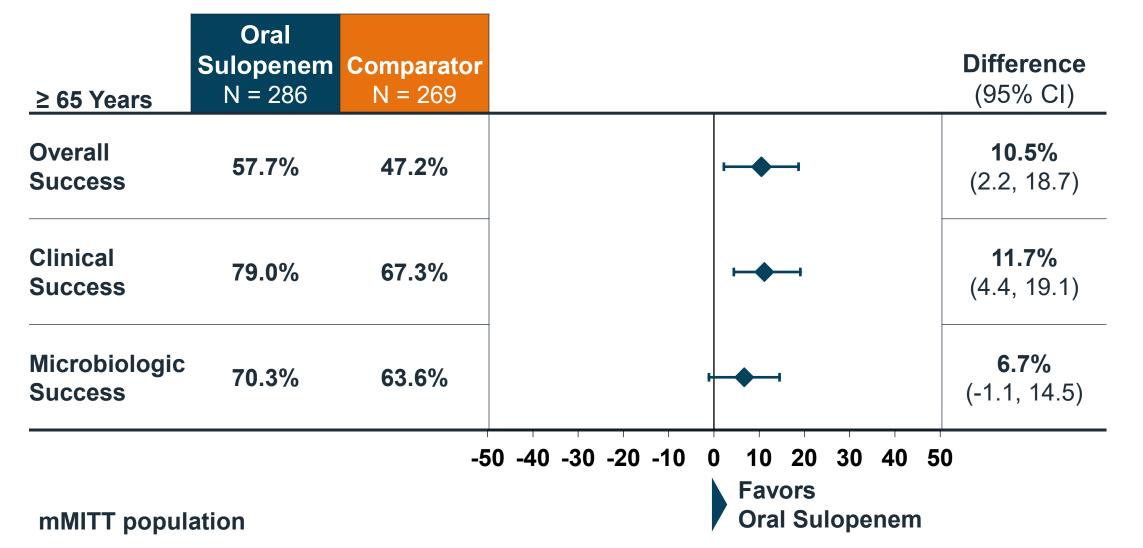
# Studies 301 and 310: Prevalence of Antibiotic Resistance According to Age Group



CO-98

# Studies 301 + 310: Treatment Response at TOC in Women ≥ 65 Years of Age Favors Treatment with Sulopenem

**CO-99** 



# Studies 301 + 310: Treatment Response in Women ≥ 65 Years vs < 65 Years of Age

	Years	Oral Sulopenem	Comparator		Difference (95% CI)
Overall Success	< 65	<b>65.3%</b> (492/753)	<b>67.6%</b> (509/753)		<b>-2.3%</b> (-7.0, 2.5)
	≥ 65	<b>57.7%</b> (165/286)	<b>47.2%</b> (127/269)	<b></b>	<b>10.5%</b> (2.2, 18.7)
Clinical Success	< 65	<b>78.8%</b> (593/753)	<b>81.4%</b> (613/753)	•	<b>-2.7%</b> (-6.7, 1.4)
	≥ 65	<b>79.0%</b> (226/286)	<b>67.3%</b> (181/269)	<b></b>	<b>11.7%</b> (4.4, 19.1)
Microbiologic Success	< 65	<b>77.7%</b> (585/753)	<b>77.3%</b> (582/753)	H H	<b>0.4%</b> (-3.8, 4.6)
	≥ 65	<b>70.3%</b> (201/286)	<b>63.6%</b> (171/269)	•	<b>6.7%</b> (-1.1, 14.5)
			-5	0-40-30-20-10 0 10 20 30 4	
mMITT popul	ation			Favors O	ral Sulopenem

# Studies 301 + 310: Treatment Response in Women ≥ 65 Years of Age in All Treatment Populations

≥ 65 Years	Success	Oral Sulopenem	Comparator		Difference (95% CI)
МІТТ	Clinical	<b>77.1%</b> (333)	<b>70.0%</b> (306)	<b>⊢</b>	<b>7.1%</b> (1.2, 12.9)
	Overall	<b>57.7%</b> (165/286)	<b>47.2%</b> (127/269)	<b>⊢</b> ,	<b>10.5%</b> (2.2, 18.7)
mMITT	Clinical	<b>79.0%</b> (226/286)	<b>67.3%</b> (181/269)	<b>⊷</b>	<b>11.7%</b> (4.4, 19.1)
	Micro	<b>70.3%</b> (201/286)	<b>63.6%</b> (171/269)	•	<b>6.7%</b> (-1.1, 14.5)
	Overall	<b>46.0%</b> (29/63)	<b>15.2%</b> (10/66)	· • • • •	<b>30.9%</b> (15.3, 45.3)
mMITTR	Clinical	<b>76.2%</b> (48/63)	<b>43.9%</b> (29/66)	· · · · • · · · · • · · · · · • · · · ·	<b>32.3%</b> (15.5, 47.2)
	Micro	<b>58.7%</b> (37/63)	<b>36.4%</b> (24/66)	·•	<b>22.4%</b> (5.1, 38.4)
	Overall	<b>61.0%</b> (136/223)	<b>57.6%</b> (117/203)	<b>⊢</b>	<b>3.4%</b> (-6.0, 12.7)
mMITTS	Clinical	<b>79.8%</b> (178/223)	<b>74.9%</b> (152/203)	<b>⊢</b>	<b>4.9%</b> (-3.0, 13.0)
	Micro	<b>73.5%</b> (164/223)	<b>72.4%</b> (147/203)	F	<b>1.1%</b> (-7.3, 9.6)
	MICTO	<b>73.37</b> 0 (104/223)	· · · · · · · · · · · · · · · · · · ·	0 -40 -30 -20 -10 0 10 20 30 40 Favors Oral S	50

# **Stewardship of Sulopenem**

#### **Opportunities**

- In vitro spectrum of activity vs MDR pathogens
- Clinical effectiveness / safety
- Impact on care pathways
  - Nursing Home /
  - Emergency
     Department
  - Avoidance of PICC lines for uUTI

#### Challenges

- Widespread (appropriate) use and pressure on colonizing flora
- Off-label use
  - cUTI

#### **Mitigation Strategies**

- Stewardship guidelines
  - Professional societies
  - CDC
  - Local stewards
- Prior authorization
- Outpatient formulary process
- Care pathways
  - History of resistant pathogens
- Further development of point of care diagnostics
- Surveillance
  - National / Local

## **Proposed Indication**

 ORLYNVAH tablets, a fixed-dose combination product consisting of sulopenem etzadroxil, a penem antibacterial prodrug, and probenecid, a renal tubular transport blocking agent, is indicated in adult women ≥18 years of age for the treatment of uncomplicated urinary tract infections caused by designated susceptible microorganisms.

CO-104

# Sulopenem Etzadroxil/Probenecid (Oral Sulopenem) for Treatment of Uncomplicated Urinary Tract Infections

September 9, 2024

Iterum Therapeutics

Antimicrobial Drugs Advisory Committee